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2 **KOUL LAW FIRM**

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Attorneys for Plaintiff,
9 ARGIN HAGHOUBIAN, on behalf of himself,
all aggrieved employees,
10 and the State of California
as a Private Attorneys General

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 FOR THE COUNTY OF LOS ANGELES

14
15 ARGIN HAGHOUBIAN, an individual, on
behalf of himself, all aggrieved employees, and
16 the State of California as a Private Attorney
General,

17 Plaintiffs,

18 vs.
19

20 FAB4, LLC dba RUSSELL WESTBROOK
CDJR, a Limited Liability Corporation, and
21 DOES 1-50, inclusive,
Defendants.

Case No. 20STCV00627
Related to Case No. 20STCV28840

JUDGE: Hon. Steven Kleifield
DEPARTMENT: 57
COMPLAINT DATE: January 6, 2020

**MODIFICATION TO STIPULATION AND
AGREEMENT FOR PAGA
REPRESENTATIVE ACTION
SETTLEMENT**

1 Pursuant to Paragraph 40 of the Stipulation and Agreement for PAGA Representative Action
2 Settlement, the parties hereby modify the Settlement Agreement as follows.

3
4 Paragraph 25(d) of the Stipulation and Agreement for PAGA Representative Action
5 Settlement currently states: "Within 18 months of the Effective Date, the Defendant shall wire the
6 LWDA Payment (\$208,3560.00) to the Settlement Administrator who will then issue the LWDA
7 payments to the LWDA."

8 The parties hereby modify Paragraph 25(d) of the Stipulation and Agreement for PAGA
9 Representative Action Settlement to state: "Within 90 days of the Effective Date, the Defendant
10 shall wire the LWDA Payment (\$208,350.00) to the Settlement Administrator who will then issue
11 the LWDA payments to the LWDA."

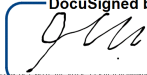
12
13 Paragraph 29(d) of the Stipulation and Agreement for PAGA Representative Action
14 Settlement currently states: "Eighteen months following the Effective Date, Defendant shall wire
15 the LWDA Payment to the Settlement Administrator who will then issue the LWDA Payment to the
16 LWDA by two checks made payable to the 'California Labor Workforce and Development
17 Agency.'"

18 The parties hereby modify Paragraph 29(d) of the Stipulation and Agreement for PAGA
19 Representative Action Settlement to state: "Within 90 days following the Effective Date, Defendant
20 shall wire the LWDA Payment to the Settlement Administrator who will then issue the LWDA
21 Payment to the LWDA by check made payable to the 'California Labor Workforce and
22 Development Agency.'"

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26 **[SIGNATURES ON FOLLOWING PAGES]**

IT IS SO AGREED:

Dated: 4/8/2021, 2021

DocuSigned by:

 ARGIN HAGHOUBIAN

Dated: _____, 2021

LEONEL RIVAS

Dated: April 7, 2021

MEHRABAN KHAJEHNOURI

Dated: April 7, 2021

FAB4, LLC dba Russell Westbrook CDJR (or FAB4, LLC dba Russell Westbrook CDJR of Van Nuys)

4/7/2021

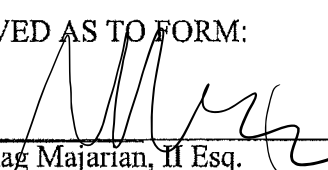
BY: _____

CFO

ITS: _____

Dated: April 8, 2021

APPROVED AS TO FORM:

By: 
 Sahag Majarian, II Esq.
 LAW OFFICES OF SAHAG MAJARIAN, II
 Attorneys for Plaintiff ARGIN HAGHOUBIAN,
 as an individuals, on behalf of himself and all
 aggrieved employees

Dated: April 8, 2021

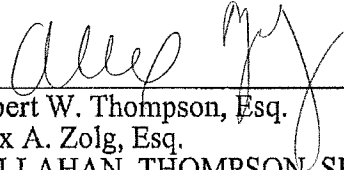
APPROVED AS TO FORM:

By: 
 Nazo Koulloukian, Esq.
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 Attorneys for Plaintiff ARGIN HAGHOUBIAN,
 as an individuals, on behalf of himself and all
 aggrieved employees

1
2
3 Dated: April 8, 2021

APPROVED AS TO FORM:

4 By:

5 
6 Robert W. Thompson, Esq.
7 Alex A. Zolg, Esq.
8 CALLAHAN, THOMPSON, SHERMAN &
9 CAUDILL, LLP
10 Attorneys for Defendant FAB4, LLC, dba RUSSELL
11 WESTBROOK CDJR (or FAB4, LLC, dba
12 RUSSELL WESTBROOK CDJR OF VAN NUYS)
13 and MEHRABAN KHAJEHNOURI

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28 Dated: _____, 2021

APPROVED AS TO FORM:

By:

Arin Norijanian, Esq.
James Demerjian, Esq.
Arin | James, LLP
Attorneys for LEONEL RIVAS, individually and on
behalf of all other aggrieved employees of
DEFENDANTS in the State of California

1 IT IS SO AGREED:

2 Dated: _____, 2021

ARGIN HAGHOUBIAN

3
4 Dated: April 13, 2021
5 Dated: _____, 2021

DocuSigned by:
Leonel Rivas
LEONEL RIVAS
QC87D529D5D4420...

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7 Dated: April 7, _____, 2021

MEHRABAN KHAJEHNOURI

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10 Dated: April 7, _____, 2021

FAB4, LLC dba Russell Westbrook CDJR (or FAB4,
LLC dba Russell Westbrook CDJR of Van Nuys)

4/7/2021

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13
14 BY: _____

15 ITS: CFO

16
17 Dated: _____, 2021

APPROVED AS TO FORM:

18
19 By: _____
Sahag Majarian, II Esq.
LAW OFFICES OF SAHAG MAJARIAN, II
Attorneys for Plaintiff ARGIN HAGHOUBIAN,
as an individuals, on behalf of himself and all
aggrieved employees

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22
23 Dated: _____, 2021

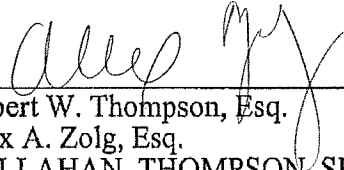
APPROVED AS TO FORM:

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25 By: _____
Nazo Koulloukian, Esq.
KOUL LAW FIRM
Attorneys for Plaintiff ARGIN HAGHOUBIAN,
as an individuals, on behalf of himself and all
aggrieved employees

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3 Dated: April 8, 2021

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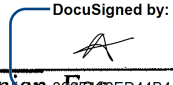
4 By:

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6 Robert W. Thompson, Esq.
7 Alex A. Zolg, Esq.
8 CALLAHAN, THOMPSON, SHERMAN &
9 CAUDILL, LLP
10 Attorneys for Defendant FAB4, LLC, dba RUSSELL
11 WESTBROOK CDJR (or FAB4, LLC, dba
12 RUSSELL WESTBROOK CDJR OF VAN NUYS)
13 and MEHRABAN KHAJEHNOURI

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By:


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James Demerjian, Esq.
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behalf of all other aggrieved employees of
DEFENDANTS in the State of California